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14 **UNITED STATES DISTRICT COURT**
15 **NORTHERN DISTRICT OF CALIFORNIA**
16 **SAN FRANCISCO DIVISION**

17
18 IN RE CATHODE RAY TUBE (CRT)
19 ANTITRUST LITIGATION

20 This Document Relates To:

21 *Sharp Electronics Corp., et al. v. Hitachi Ltd., et al.,*
No. 13-cv-1173;

22 *Electrograph Systems, Inc. et al. v. Technicolor SA,*
23 *et al.,* No. 13-cv-05724;

24 *Siegel v. Technicolor SA, et al.,* No. 13-cv-05261;

25 *Best Buy Co., Inc., et al. v. Technicolor SA, et al.,*
No. 13-cv-05264;

26 *Target Corp. v. Technicolor SA, et al.,* No. 13-cv-
27 05686;

28 *Interbond Corporation of America v. Technicolor*
SA, et al., No. 13-cv-05727;

Case No. 07-cv-5944 (SC)

MDL No. 1917

**DECLARATION OF CRAIG A.
BENSON IN SUPPORT OF THE
STATEMENT OF PLAINTIFFS
SHARP ELECTRONICS
CORPORATION AND SHARP
ELECTRONICS
MANUFACTURING COMPANY OF
AMERICA, INC. REGARDING
PENDING DISCOVERY MOTIONS
AGAINST THOMSON SA**

1 *Office Depot, Inc. v. Technicolor SA, et al.*, No. 13-
2 cv-05726;

3 *Costco Wholesale Corporation v. Technicolor SA, et*
4 *al.*, No. 13-cv-05723;

5 *P.C. Richard & Son Long Island Corporation, et al.*
6 *v. Technicolor SA, et al.*, No. 13-cv-05725;

7 *Schultze Agency Services, LLC v. Technicolor SA,*
8 *Ltd., et al.*, No. 13-cv-05668;

9 *Sears, Roebuck and Co. and Kmart Corp. v.*
10 *Technicolor SA*, No. 3:13-cv-05262;

11 *Tech Data Corp., et al. v. Hitachi, Ltd., et al.*, No.
12 13-cv-00157;

13 *Crago, et al. v. Mitsubishi Electric Corp.*, No. 14-cv-
14 2058.

15 I, CRAIG A. BENSON, hereby declare as follows:

16 1. I am a partner with the law firm of Paul, Weiss, Rifkind, Wharton &
17 Garrison LLP, counsel for Plaintiffs Sharp Electronics Corporation (“SEC”) and Sharp
18 Electronics Manufacturing Company of America, Inc. (“SEMA”). I am an active member in
19 good standing of the bars of the State of Maryland, the State of New York, and the District of
20 Columbia, and on March 20, 2013 was granted leave to appear *pro hac vice* in this litigation. I
21 have personal knowledge of the facts stated herein and could competently testify to these facts if
22 called upon to do so. I submit this Declaration in support of the Statement of SEC and SEMA
23 regarding pending discovery motions against Thomson SA.

24 2. On October 27, 2014, I conferred with counsel for Thomson SA to
25 ascertain Thomson SA’s views regarding the depositions of Emeric Charamel, Christian
26 Lissorgues, Agnes Martin, and Didier Trutt.

27 3. Counsel for Thomson SA took the position that the Court’s order dated
28 October 23, 2014 does not require them to make the four witnesses available for deposition.

4. Counsel for Thomson SA stated that Thomson SA does not oppose the use of Hague Convention procedures to seek these four fact witness depositions, and Thomson SA's previous objections to the DAPs' motion for letters rogatory for these four depositions are withdrawn in light of the Court's October 23 Order.

5. Counsel for Thomson SA confirmed that Thomson SA will produce for deposition a Rule 30(b)(6) witness educated on documents and materials located in France.

I declare under penalty of perjury, that the foregoing is true and correct. Executed
this 28th day of October, 2014, at Washington, DC.

/s/ *Craig A. Benson*

Craig A. Benson